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October 10, 2003

Mr. Thomas N. Dorman
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40601

RE: Case No. 2003-00304

Dear Mr. Dorman:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of CoVad Communications Company's Motion to Intervene. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me the enclosed, self-addressed stamped envelope.

Sincerely,

Douglas F. Brent

Counsel for

CoVad Communications Company

DFB:jms

enc.

cc: Parties of Record

COMMONWEALTH OF KENTUCKY



PECEIVED
PUBLIC SERVICE
COMMISSION

In the Matter of:

THE REVIEW OF BELLSOUTH)		
TELECOMMUNICATIONS, INC.)	Case No.	2003-00304
PRICE REGULATION PLAN)		

MOTION TO INTERVENE

Pursuant to 807 KAR 5:001, Section 3(8) and Ordering paragraph 1 of the Order issued October 2, 2003, in the above-captioned proceeding, Dieca Communications, Inc. d/b/a Covad Communications Company ("Covad") submits this motion for full intervention in the above-captioned proceeding.

Dieca Communications, Inc. d/b/a Covad Communications Company ("Covad") is a utility authorized to provide service in Kentucky and is party to an interconnection agreement with BellSouth. Covad has an interest in this proceeding insofar as BellSouth claims to have not only met but exceeded Objective Number 4 of the Transition Regulation Plan ("TRP").

The Order initiating this proceeding invited all interested persons to file comments concerning BellSouth's proposed changes to its TRP. While Covad is not filing comments at this time, Covad intends to participate in this proceeding and desires to receive orders, notices, and pleadings or other papers filed in this proceeding by BellSouth or any other party. Covad's participation is likely to present issues that will assist the Commission without unduly complicating the proceeding.

Covad requests that all pleadings and other documents be served upon:

C. Kent Hatfield Douglas F. Brent Middleton Reutlinger 2500 Brown & Williamson Tower Louisville, KY 40202

and

Charles (Gene) Watkins Senior Counsel Covad Communications Company 1230 Peachtree Street, NE, 19th Floor Atlanta, GA 30309

For the reasons stated above, Covad asks that this Motion for Full Intervention be

granted.

Charles E. Watkins Senior Counsel COVAD COMMUNICATIONS COMPANY 1230 Peachtree Street, NE 19th Floor Atlanta, Georgia 30309 (404) C. Kent Hatfield Douglas F. Brent MIDDLETON REUTLINGER 2500 Brown & Williamson Tower Louisville, Kentucky 40202 (502) 584-1135

COUNSEL FOR COVAD COMMUNICATIONS COMPANY

CERTIFICATE OF SERVICE

A copy of the foregoing was served this 10th day of October, 2003, first class, United States mail, postage prepaid, upon all parties identified on the Commission's service list in Case No. 2003-00304.

Douglas F. Brent

Honorable Jonathon N. Amlung Attorney at Law 1000 Republic Building 429 W. Muhammad Ali Boulevard Louisville, KY 40202-2347

Deborah Barrett Vice President, Regulatory One Call Communications, Inc. dba AdvanTel, et al Suite 100 801 Congressional Boulevard Carmel, IN 46032

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Director of Regulatory Affairs
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Honorable Richard M. Breen 2950 Breckenridge Lane Suite 3 Louisville, KY 40220

Honorable Dorothy J. Chambers General Counsel/Kentucky BellSouth Telecommunications, Inc. 601 West Chestnut Street, Room 410 P. O. Box 32410 Louisville, KY 40232

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Honorable Ken Woods MCI WorldCom 6 Concourse Parkway Suite 3200 Atlanta, GA 30328 Honorable Holland N. McTyeire, V Attorney at Law Greenebaum Doll & McDonald PLLC 3300 National City Tower 101 South Fifth Street Louisville, KY 40202-3197

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